

CLEARY GOTTlieb STEEN & HAMILTON LLP

Lawrence B. Friedman

Breon S. Peace

One Liberty Plaza

New York, New York 10006

*Attorneys for BNP Paribas S.A., BNP Paribas
(Suisse) S.A., BNP Paribas Arbitrage SNC, BNP
Paribas Bank & Trust (Canada), BNP Paribas
Bank & Trust Cayman Limited, BGL BNP
Paribas Luxembourg S.A., BNP Paribas
Securities Services – Succursale de Luxembourg,
and BNP Paribas Securities Services S.A.*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

SECURITIES INVESTOR PROTECTION CORPORATION, :

Adv. Pro. No. 08-01789 (BRL)

Plaintiff-Applicant, :

v. :

SIPA Liquidation

BERNARD L. MADOFF :

INVESTMENT SECURITIES LLC, :

Defendant. :

(Substantively Consolidated)

----- X

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC, :

Adv. Pro. No. 12-01576 (BRL)

Plaintiff, :

v. :

**ORAL ARGUMENT
REQUESTED**

BNP PARIBAS S.A., et al., :

Defendants. :

----- X

**NOTICE OF MOTION OF THE BNPP DEFENDANTS
FOR AN ORDER WITHDRAWING THE REFERENCE
TO THE BANKRUPTCY COURT**

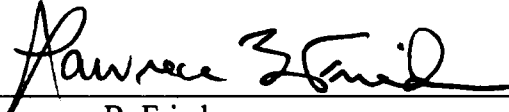
PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal Rules of Bankruptcy Procedure and Rule 5011-1 of the Local Rules of the Bankruptcy Court, and upon the Declaration of Jamie Rietema, dated July 26, 2012, the attached exhibit, and the accompanying Memorandum of Law, dated July 26, 2012, defendants BNP Paribas S.A., BNP Paribas (Suisse) S.A., Individually and as Successor in Interest to BNP Paribas Private Bank (Switzerland) S.A. and as Successor in Interest to United European Bank, BNP Paribas Arbitrage SNC, BNP Paribas Bank & Trust (Canada), BNP Paribas Bank & Trust Cayman Limited, BGL BNP Paribas Luxembourg S.A., as Successor in Interest to BNP Paribas Luxembourg S.A., BNP Paribas Securities Services—Succursale de Luxembourg, and BNP Paribas Securities Services S.A. (collectively, “the BNPP Defendants”), by and through their undersigned attorneys, hereby move the Court for an order withdrawing the reference of this action to the Bankruptcy Court for the Southern District of New York.

The BNPP Defendants have made no previous request for the relief request by this motion.

The BNPP Defendants respectfully request oral argument on this motion.

Dated: July 26, 2012
New York, New York

CLEARY GOTTlieb STEEN & HAMILTON LLP

By: 
Lawrence B. Friedman
Breon S. Peace

One Liberty Plaza
New York, New York 10006
(212) 225-2000
(212) 225-3999 (facsimile)
lfriedman@cgsh.com
bpeace@cgsh.com

*Attorneys for BNP Paribas S.A., BNP Paribas
(Suisse) S.A., BNP Paribas Arbitrage SNC, BNP
Paribas Bank & Trust (Canada), BNP Paribas
Bank & Trust Cayman Limited, BGL BNP Paribas
Luxembourg S.A., BNP Paribas Securities Services
– Succursale de Luxembourg, and BNP Paribas
Securities Services S.A.*